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17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF
21 GOVERNMENT EMPLOYEES, AFL-CIO, et
al.,

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity as
25 President of the United States, et al.,

26 Defendants.
27
28

Case No.: 3:25-cv-03070-JD

DECLARATION OF WALT TAYLOR

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I, Walt Taylor, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the President of the Defense Commissary Agency (“DECA”) Council at American Federation of Government Employees (“AFGE”). I have been the president for four years. Before that, I was vice-president of DECA and I was a federal employee employed by DECA. I was a federal employee for 23 years.

3. The DECA Council is the exclusive bargaining representative of about 10,000 civil servants in DECA, which is within the Department of Defense. All of the bargaining unit workers work in the commissaries (that is, the grocery stores) on military bases. For instance, they work as cashiers and in the produce department, meat department, and so on. These workers do not have anything to do with national security. The commissaries are available to military employees and their families, veterans, and military retirees. My understanding is that the March 27, 2025 Executive Order titled “Exclusions from Federal Labor Management Relations Programs” (“Exclusion Order”) covers all of the workers in the DECA bargaining unit.

4. I am also a member of Local 1923, which is one of the largest bargaining units in AFGE. Local 1923 represents a variety of civil workers in the Maryland area, including DECA workers, Social Security Administration Workers, Veterans Affairs workers. It covers five DECA commissaries in Maryland.

5. The DECA Council’s mission is to advocate for and promote the interests of DECA employees in their federal employment, including working for a safe and fair workplace for all members. The DECA Council represents workers at 120 commissaries. As the exclusive bargaining representative of these workers, the DECA Council provides many services to all bargaining unit members. Core functions include collective bargaining with the agency to obtain a fair and reasonable master labor agreement (“MLA”); filing and negotiating grievances against the agency to enforce the terms and conditions of the MLA; pursuing arbitrations on behalf of

workers to enforce the MLA; and providing other support, guidance, and resources to bargaining unit employees. Local 1923 similarly advocates for and supports its members in Maryland, including negotiating and enforcing local collective bargaining agreements for local units; bringing grievances and arbitrations; and providing information, training, and support to members.

6. The Exclusion Order will have an immediate adverse effect on the DECA Council's ability to provide these services to unit members and to accomplish its mission. The Exclusion Order will also have an immediate adverse impact on workers in the bargaining unit.

7. If the Council is no longer the exclusive bargaining representative of the unit, the MLA cannot be enforced against the agency. The MLA, which is effective from 2023 into 2027, provides important rights and protections to workers. For instance, the MLA:

- a. Sets terms and conditions for working hours, overtime, sick leave, holidays, and paid time off for workers in the unit.
- b. Imposes safety and health requirements to ensure the welfare of workers in their place of employment.
- c. Imposes procedures for and limitations on disciplinary and adverse actions against workers.
- d. Provides for an Employee Assistance Program for individuals who have problems associated with alcohol, drug, marital, family, legal, financial, stress, attendance, and other personal concerns.
- e. Establishes grievance and arbitration procedures for employees and the Union to resolve disputes with the agency over employment matters.
- f. Provides for official time and space, which allows bargaining unit employees to perform union representation activities during certain amounts of time the employee otherwise would be in a duty status, without loss of pay or charge to annual leave, and on agency property.

1 Without the Council to represent them and enforce the MLA, the workers will not have
2 the benefit of those rights and protections going forward. I understand that the agency is also
3 likely to rescind the MLA under the Exclusion Order, which will deprive the Council of the
4 binding contract that it negotiated.

5 8. The Council's and Local 1923's staff and activities are funded through members'
6 voluntary dues, most of which are paid through payroll deduction from their pay. If AFGE can
7 no longer receive dues through payroll deduction under the Exclusion Order, that will make it
8 significantly more difficult for the unions to continue to function and to provide the services and
9 protection to unit members listed above.

10 9. Official time and space is very important to enable DECA workers with union
11 roles to perform representative activities on behalf of their coworkers while on government time
12 and in the workplace. Taking union representatives off official time will hamstring the Council's
13 ability to perform its fundamental functions of representing members in their daily workplace
14 lives.

15 10. DECA workers are very concerned about the Exclusion Order. I know workers
16 who are afraid and do not want President Trump, Elon Musk, or DOGE to find out that they are
17 members of the union. The workers are worried that they will lose their job, be denied a
18 promotion, or lose other employment rights if the Administration realizes that they support the
19 union.

20 11. I declare under penalty of perjury under the laws of the United States that the
21 foregoing is true and correct. Executed April 1, 2025, in Randallstown, Maryland.

22 DocuSigned by:
23 *Walter Taylor*
24 6CF95B9ECAE64CF...

25 Walt Taylor